

  
**Baker**

03.01-9/28/2000-02552

**Baker Environmental, Inc.**

*A Unit of Michael Baker Corporation*

Airport Office Park, Building 3  
420 Rouser Road  
Coraopolis, Pennsylvania 15108

(412) 269-6000  
FAX (412) 269-6097

September 28, 2000

Commander  
Atlantic Division  
Naval Facility Engineering Command  
1510 Gilbert Street (Building N-26)  
Norfolk, Virginia 23511-2699

Attn: Mr. Kirk Stevens  
Navy Technical Representative  
Code 18232

Re: Contract N62470-95-D-6007  
Navy CLEAN, District III  
Contract Task Order (CTO) 0130  
Natural Attenuation Evaluation  
Discussion of Future Activities at Site 73

Dear Mr. Stevens:

A report entitled "Natural Attenuation Evaluation Report, Operable Unit No. 9, Amphibious Vehicle Maintenance Facility, Marine Corps Base, Camp Lejeune, North Carolina" was submitted in February 2000 for review by the IR Partnering Team members. Since that time, comments have been received from NCDHNR, EPA, and NEHC. No additional comments are expected. All the comment letters received question various technical elements of the report; but, generally agree with the two primary conclusions that natural attenuation is actively occurring in the upper surficial aquifer and that contamination has not been sufficiently characterized in the lower aquifer. Given this general accord, spending the time, effort, and money needed to finalize the report at this time may not represent the optimal use of available funding. This letter outlines a continued addressing of site conditions rather than a formal "draft to final report" scenario.

Addressing the need for further site characterization appears to Baker to be the priority. Nothing can be finalized regarding final site disposition without firm knowledge of the nature and extent of contamination in the lower aquifer. Therefore, Baker recommends that the next step in moving the site towards final closeout be the development of a work plan for additional investigations. There does not appear to be a pressing need to polish the existing report which could free up some of the funds required for the work plan development. At some point in the future, the report can be "finalized" by placing a final cover with an explanatory letter in the administrative record. This step is needed to ensure that a fully understandable record exists that describes the process at Site 73.



**Baker**

Mr. Kirk Stevens  
September 28, 2000  
Page 2

The following is a possible scenario for moving forward at Site 73 in a stepwise manner that is within the regulations but is streamlined to save time and money. Each step is detailed separately:

- Develop work plan for additional investigations and obtain appropriate approvals.
- Perform the field investigations and provide either a summary report that could be stand-alone or an addendum to the existing report.
- Prepare an Engineering Evaluation/Cost Analysis (EE/CA) that addresses natural attenuation and any necessary "hot spot" remediation in the lower aquifer or at the Courthouse Bay bulkhead in the upper surficial aquifer.
- Once all parties are agreed, prepare a Record of Decision that can be signed and then implemented.

It is recognized that this approach is somewhat unorthodox, but we believe that it will get the site to clean up quicker and will result in an overall cost savings to the Navy. Please do not hesitate to call me at (412) 269-2065 if you have any questions or would like to discuss the proposed approach in a more-detailed manner. If this proposed approach does not appeal to the Navy for any reason, please advise and we will begin addressing the report comments.

Sincerely,

**BAKER ENVIRONMENTAL, INC.**



Thomas C. Fuller  
Project Manager

pcl

cc: Channing Blackwell, LANTDIV  
Rick Raines, EMD Camp Lejeune  
Scott Bailey, CH2M Hill